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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

August 23, 2013

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 635 Friends of Anna Little and Robert Lee Little, III, Treasurer,  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Send a representative to an FEC seminar; develop and certify implementation of a compliance operations manual which includes internal controls consistent with the Commission's Best Practices for Committee Management (2009 update) and a process to track receipt of, and response to, communications with the Commission; continue to retain outside an compliance vendor to review reports for a period of two years; and pay a civil penalty of \$6,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 635 (MUR 6588). The ADR Office received this referral in a memo dated April 5, 2013.

SUMMARY: Charles Measley filed a complaint dated May 29, 2012, alleging that Respondents failed to file reports for Anna Little's 2012 Congressional campaign as well as her prior Senatorial campaign for the same cycle. At the time the complaint was written, no reports were filed except a February, 2012, Statement of Organization. On June 1, 2012, Respondents filed a report disclosing \$161,152 in

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receipts and \$147,317 in disbursements from the period beginning January 1, 2011 and ending March 31, 2012, a total of \$308,469 in previously undisclosed financial activity.

Respondents contend that reports were not timely filed due to redistricting issues. Respondents contend that the candidate was unsure whether she would run for office, and if so in what district she would run, due to a late decision on redistricting. In addition, Respondents contend that issues in conjunction with Hurricane Sandy prevented the filing of reports near the election. Respondents acknowledge that the former treasurer made mistakes. Respondents have since replaced the Treasurer and hired an experienced professional.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Friends of Anna Little and Robert Lee Little, III, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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